

# Exhibit C

**FOX ROTHSCHILD LLP**

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*Attorneys for Plaintiff, Legal Bay LLC*

LEGAL BAY LLC,

Plaintiff,

vs.

MUSTANG FUNDING, LLC, MUSTANG  
SPECIALTY FUNDING I, LLC, MUSTANG  
SPECIALTY FUNDING II, LLC, JAMES  
BELTZ and KEVIN CAVANAUGH,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
ESSEX COUNTY – CHANCERY DIVISION

Civil Action

Docket No.: ESX-C-86-22

**CERTIFICATION OF  
DILIGENT INQUIRY AND  
PERSONAL SERVICE UPON  
DEFENDANT JAMES BELTZ**

**KIERAN T. ENSOR, ESQ.**, of full age, hereby states as follows:

1. I am an attorney-at-law of the State of New Jersey and an associate with the law firm of Fox Rothschild, LLP, attorneys for Plaintiff, Legal Bay, LLC (“Legal Bay”). This certification is made based upon my personal knowledge, pursuant to Rule 4:4-4(b)(1)(A), to

effectuate service of Legal Bay's Verified Complaint and Summons on Defendant Jimmy Beltz ("Beltz").

2. From years of ongoing business relationships, Legal Bay was personally aware that Beltz did not have a personal residence in New Jersey.

3. Based upon further investigation, it was confirmed that Beltz is an individual with a residential address of 430 Peavey Road, Wayzata, Minnesota, and a work address of Suite 250, 701 Lake Street East, Wayzata, Minnesota.

4. Pursuant to Rule 4:4-4(b)(1)(A), Beltz was personally served a copy of the Summons and Verified Complaint on May 18, 2022, at 3:48 p.m. at Suite 250, 701 Lake Street East, Wayzata, Minnesota 55391. A true and correct copy of the Affidavit of Service is annexed hereto as **Exhibit A**.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willingly false, I am subject to punishment.

  
KIERAN T. ENSOR

Dated: June 8, 2022

# Exhibit A

State of New Jersey

SUPERIOR COURT

County of Essex

Legal Bay LLC

Court File Number

Plaintiff,

ESX-C-000086-22

vs.

Mustang Funding, LLC, et al.

Defendant,

Affidavit of Service

State of Minnesota

County of Hennepin

Neil Hanson, being duly sworn, on oath says that on Wednesday, May 18, 2022 at 3:48 PM he served the Summons, Complaint, & Exhibits upon James Beltz, therein named, personally at Suite 250, 701 Lake Street East, Wayzata, MN 55391, by handing to and leaving with James Beltz, a true and correct copy thereof.

 5/18/2022

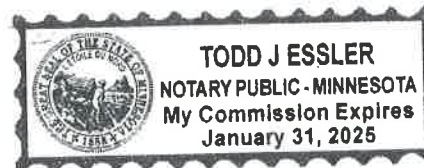
Neil Hanson, Process Server

Subscribed and Sworn to before me on

5/18/2022



(Signature of Notary)



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